

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MUSKET CORPORATION,

Plaintiff,

- against -

PDVSA PETROLEO, S.A., a/k/a PDVSA
PETROLEO Y GAS, S.A., and ADVANCED
ENGINEERING DEVELOPMENT LTD.,

Defendants.

JUDGE MARRASO

06 CV 15522

Civil Action No.

**DECLARATION IN SUPPORT
OF APPLICATION FOR
ORDER OF ATTACHMENT**

JOHN J. REILLY hereby declares the following to be true under penalty of perjury:

1. I am a member of the bar of this Court and am a member of the firm of Holland & Knight LLP, attorneys for plaintiff Musket Corporation. I make this affidavit in support of plaintiff's application for an ex parte order of attachment, permitting the attachment of the proceeds of a Letter of Credit established by plaintiff for the benefit of defendant PDVSA Petroleo S.A. ("PDVSA"). I am fully familiar with the facts and circumstances stated below.

2. By this application, plaintiff does not seek to enjoin the non-party bank, JPMorgan Chase, from honoring the presentation by the beneficiary of the letter of credit. Rather, plaintiff seeks to attach funds that have been drawn down but not yet disbursed by the bank. As explained in the accompanying memorandum of law, these funds are property of the defendant and are subject to attachment. Because the funds are likely to be paid out by the bank tomorrow morning (December 29), urgent action is required.

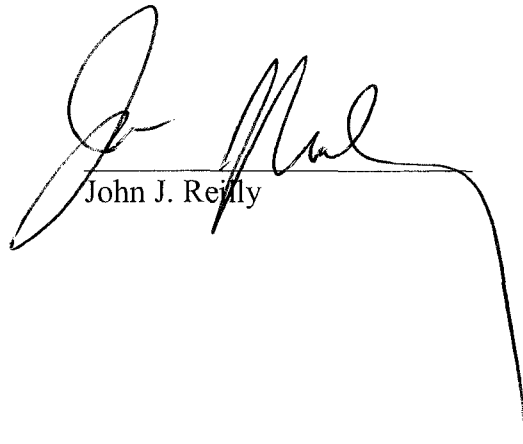
3. We are filing a supporting affidavit of Mr. Ravi Ramdas, which was sworn to today in Oklahoma. Due to the shortness of time, we do not yet have the original affidavit in

hand and are filing a photocopy received by fax. We will file the original affidavit with the court as soon as it is received by us.

4. In view of the urgency of the matter, we request that the Court authorize two of the managing clerks employed by my law firm, Mr. Elvin Ramos and Mr. Rudy Green, to serve the requested order on the garnishee. This will avoid the delays that may occur if the U.S. Marshal is directed to serve the order.

5. We have not previously sought this relief from this or any other court.

Dated: New York, New York
December 28, 2006



John J. Reilly